

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY WASHINGTON, D.C. 20460

OFFICE OF PESTICIDES AND TOXIC SUBSTANCES

MEMORANDUM

DATE:

May 6, 2009

SUBJECT:

Science Review in Support of the Registration of Mint-X Trash Bags, A Non-Food Use End-Use Product Containing 0.288% Methyl Salicylate, 0.288% Corn

Mint Oil (New Active Ingredient), 0184% Camphor White Oil, and 0.04%

Eucalyptus Oil.

Decision Number:

399051

DP Number:

361751 85589-R

EPA File Symbol Number: Chemical Class:

Biochemical

PC Codes:

076601 (methyl salicylate); None (Corn Mint Oil); 015601

Camphor white oil); & 040503 (Oil of Eucalyptus)

CAS Number:

119-36-8; 68917-18-0;

Tolerance Exemptions:

Not applicable; non-food use product

MRID Numbers:

476241-01 to -05; and 475156-03

FROM:

Russell S. Jones, Ph.D., Senior Biologist

Biochemical Pesticides Branch

Biopesticides & Pollution Prevention Division (7511P)

TO:

Raderrio Wilkins, Regulatory Action Leader

Biochemical Pesticides Branch

Biopesticides & Pollution Prevention Division (7511P)

THE FOLLOWING CONTAINS CONFIDENTIAL BUSINESS INFORMATION

ACTION REQUESTED

On behalf of JAD Corporation, E. Nestmann (Cantox US, Inc.), requests registration of Mint-X Trash Bags, containing four active ingredients: methyl salicylate, corn mint oil (New Active Ingredient), camphor white oil, and eucalyptus oil. These active ingredients are incorporated into the polymers comprising the bag.

Methyl salicylate, Corn mint oil, Camphor white oil, Eucalyptus Oil PC Codes: 076601, None, 015601, & 040503, respectively

DP Number: 361751 EPA Reg. No.: 85589-R

In support of the registration, the registrant has submitted product chemistry studies and data, acute toxicity studies and toxicity study waiver requests, waiver requests for non-target organism studies, and efficacy studies.

RECOMMENDATIONS AND CONCLUSIONS

- 1a. Product chemistry data are UNACCEPTABLE, but upgradeable. To upgrade the product chemistry submission to acceptable. Despite the claim made by the registrant, the product IS produced via an integrated system because all four active ingredients are obtained from non-EPA-registered sources (see 40 CFR 158.300: Definitions). Therefore, the registrant must provide a separate and complete TGAI product chemistry data package for each active ingredient, which includes (see Table under 40 CFR 158.2030; see also NOTE 5 below):
 - (i) Product identity and composition (OPPTS 830.1100/880.1100);
- NOTE 1: If an active ingredient is documented to be obtained from a food grade source the data requirements listed in 1a(ii) through 1a(vi) may be waived.
 - (ii) Description of the Manufacturing/Formulation Process (OPPTS 830.1200/880.1200);
 - (iii) Discussion of the Formation of Impurities (OPPTS 830.1400/880.1400), if any, for each active ingredient, unless it is documented that they are 100% (see NOTE 2 below);
 - (iv) Preliminary Analysis (OPPTS 830.1700), 5-separate batches for each a.i;
- NOTE 2: This data requirement may be satisfied by submission of Certificates of Analysis for 5 separate batches of each active ingredient, obtained from the respective suppliers;
 - (v) Certified Limits (OPPTS 830.1750) for each active ingredient, unless it is documented that they are 100% (see NOTE 2 above);
 - (vi) Enforcement Analytical Methods (OPPTS 830.1800) for each active ingredient;
- NOTE 3: A journal article (Konkol et al., 2003) describing development of the enforcement analytical method is provided in MRID 47624101. This method was provided in support of the Analytical Methods data requirement for each active ingredient in the end-use product (Mint-X Trash Bags), however, of the four active ingredients in the product, the journal article specifically describes the analysis for methyl salicylate only.

Methyl salicylate, Corn mint oil, Camphor white oil, Eucalyptus Oil DP Number: 361751 PC Codes: 076601, None, 015601, & 040503, respectively EPA Reg. No.: 85589-R 1b. The physical/chemical characteristics of the End-Use Product, Mint-X Trash Bags, are provided in MRID 476241-01, pp. 28-38, together with some physical/chemical characteristics for each TGAI. The following physical/chemical characteristics MUST be provided for each TGAI: Color and Odor for each active ingredient; (i) (ii) Boiling points for Corn Mint Oil, Camphor Oil and Eucalyptus Oil; (iii) Viscosity for each active ingredient. NOTE 4: Any appropriate physical/chemical characteristics that may be listed in submitted MSDS for the active ingredients must be summarized and tabularized by the registrant. NOTE 5: BPB notes that some information supporting the TGAI product chemistry data requirements have been submitted for each TGAI. However, this information needs to be organized separately for each a.i. together with the data/information requested above.

1c. Corn Mint Oil is a New Active Ingredient. This will change the PRIA Category and fees for

1d. The product chemistry studies and information submitted for the End-Use Product is

2a. Studies/data/waivers submitted in support of the data requirements for Tier I toxicity, Tier I Non-Target Organisms, and Product Performance will be reviewed upon resolution of the

ACCEPTABLE, pending resolution of Conclusions 1a and 1b above.

registration of this product.

Product Chemistry deficiencies.

cc: R. S. Jones, R. Wilkins, BPPD Chron File, IHAD/ARS

Russell S. Jones, Ph.D., Senior Biologist, FT, PY-S: 05/06/2009